FAR 52.204-21 SUSTAINED INCONSISTENCY WOSB NEVADA FCI ENVIRONMENT

Population Observation 1. FCI Boundary Scope and Record Surface

The WOSB certification class, as it operates within the Nevada federal contracting environment under obligations established by FAR 52.204-21, produces a contractor population whose Active FCI Posture Record documentation, at the point of review, contains a boundary description that does not correspond to the organization's present FCI scope as that scope has expanded through personnel additions, system changes, and subcontractor relationships accumulated since the record was last confirmed. The record surface across this population shows documentation in which the FCI boundary is defined by reference to systems and access points that were present at the time of initial documentation. Systems added after that point, access pathways established through remote work configurations, and subcontractor data flows that have since been incorporated into daily operations do not appear in the record as it currently exists. The condition and its counterpart are both present at the point of review. The record either reflects the present FCI scope or it does not reflect it. Where it does not, the boundary described in the documentation and the boundary that exists in the operating environment have diverged, and the record contains the earlier configuration without reflecting the additions that have since entered the scope.

Population Observation 2. Accessibility and Boundary Accuracy

Assessment cycle review processes observe that the record, where it exists within this population, is accessible in the sense that a document can be located and produced, while the contents of that document do not correspond to the environment as it is currently configured, a condition in which each is observable and neither supersedes the other. The record contains the current configuration or it contains an earlier one. Among peer contractors within the same regional certification population, the FCI boundary scope is underestimated in the documentation at a structural level, in that the categories of information, systems, and personnel that fall within the boundary under FAR 52.204-21 are broader than what the record addresses. A record whose last confirmed state predates the most recent boundary-affecting event persists as the current documentation without revision. The record surface shows what was documented. It does not show what has entered the boundary since that documentation was produced.

Population Observation 3. Sustained Divergence

Neither resolves the other in the current record state. The FCI boundary as it exists within WOSB contractor organizations in Nevada includes information types, transmission methods, and storage configurations that have changed since the record last addressed them, and the record as it exists at the point of assessment cycle review does not reach the present boundary. A record whose contents have not been validated against the present boundary remains the operative documentation. The record either captures the present state of the boundary or it does not. The sustained condition across this population is one in which the documented boundary and the actual boundary remain in a state of inconsistency that the record itself does not surface, and assessment cycle review processes observe this divergence at the point of review without the organization having identified it internally.